

AO 91 (Rev. 11/11) Criminal Complaint

## FELONY

United States Courts  
Southern District of Texas

## UNITED STATES DISTRICT COURT

FILED

October 22, 2020

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America

v.

Carlos TORRES

Case No. B-20-MJ-768

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 21, 2020 in the county of Cameron in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

21 USC 841 &amp; 846

## Offense Description

Possession with Intent to Distribute approximately 184.47 kilograms of marijuana, a Schedule I controlled substance, and Conspiracy of the same.

This criminal complaint is based on these facts:

See Attachments.

☒ Continued on the attached sheet.  
Complainant's signature

Tyler Hay, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/22/2020  
Judge's signatureCity and state: Brownsville, Texas

Ronald G. Morgan, US Magistrate Judge

Printed name and title

United States


V.

Carlos TORRES

ATTACHMENT – A  
(AFFIDAVIT)

On October 21, 2020, at approximately 5:00 pm, Border Patrol drone operators, conducting line duty operations, observed a white Ford Ranger being floated across the Rio Grande River from Mexico into the United States. Agents, based on training and experience, know that this is a common tactic used to smuggle bulk marijuana into the United States. Operators dispatched patrol Agents to the immediate area in order to respond and continue to observe the activity. A few minutes later, Agents in the area observed a white Ford Ranger pickup truck, bearing TX license plate: [REDACTED] arrive near the gap in the border fence on Alaska Road. Patrol Agents observed the driver, a Hispanic male wearing a black shirt, as the sole occupant of the vehicle.

Border Patrol Agents, utilizing marked units with lights and sirens, attempted to stop the pickup based on the previously observed activity. The vehicle continued on into an empty field, failing to yield to Agents. Agents continued to pursue the vehicle, until it ultimately crashed into a water filled sandpit, submerging the vehicle. The driver, later identified as Carlos TORRES, immediately exited the vehicle and began to wade through the water to evade capture. Once TORRES observed that he was surrounded by Agents, he ultimately surrendered. Agents, subsequently making contact with the driver and the vehicle, observed the vehicle was loaded with what appeared to be bundles of suspected narcotics. TORRES was ultimately taken into custody, where seventeen (17) bundles were recovered from the vehicle, and a field test conducted yielded positive results for marijuana. DEA Agents were contacted for federal prosecution and responded to speak with TORRES. During a post Miranda interview, TORRES admitted to Agents to knowingly and intentionally possessing with intent to distribute the seventeen (17) bundles of marijuana originally seized. TORRES advised Agents that he was going to be paid an unknown amount of US currency for his role in the transportation of the bundles. The seventeen (17) bundles were ultimately weighed with an approximate weight of 184.47 kilograms in total.

  
Cooperating Agent's signature

Tyler Hay, DEA Special Agent  
Printed Name and Title

Sworn to before me, and subscribed in my presence on,

Date: October 22, 2020

City and State: Brownsville, Texas

  
Judge's Signature

Ronald G. Morgan, United States Magistrate  
Printed Name and Title